Postal Regulatory Commission Submitted 10/30/2015 3:35:55 PM Filing ID: 93670 Accepted 10/30/2015

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
BILATERAL AGREEMENT BETWEEN UNITED STATES POSTAL SERVICE
AND ROYAL MAIL GROUP, LTD. (CP2015-1)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2015-1

UNITED STATES POSTAL SERVICE MOTION FOR TEMPORARY RELIEF CONCERNING A COMPETITIVE MULTI-SERVICE AGREEMENT WITH A FOREIGN POSTAL OPERATOR

(October 30, 2015)

Pursuant to 39 C.F.R. § 3001.21, the United States Postal Service (Postal Service) hereby seeks to have the agreement that is the subject of this docket continue in effect while Royal Mail Group, Ltd. and the Postal Service conclude negotiations concerning a successor agreement.

As background, the Postal Service is currently negotiating with the foreign postal operator to extend the bilateral agreement that is the subject of the docket for another full year, but there are difficult operations issues to resolve for exchanging returns between the two countries. The Postal Regulatory Commission previously granted a motion for temporary relief extending the agreement until November 15, 2015. A second modification has been sent to Royal Mail Group, Ltd. to extend the current agreement until December 31, 2015, but it has not yet been signed. The Postal Service understands that the counterparty's contact is working to secure a signature from a responsible official but those efforts are still in progress.

¹ PRC Order No. 2729, Order Granting Motion for Temporary Relief, Docket No. CP2015-1, September 24, 2015. *See also* Notice of Filing Modification to Outbound Competitive International Merchandise Return Service Agreement with Royal Mail Group, Ltd., Docket No. CP2015-1, October 23, 2015.

2

In the meantime, the Postal Service respectfully requests that the Commission

approve a brief extension of the agreement that is the subject of this docket, to maintain

continuity of pricing and other terms and conditions of the agreement. The Postal

Service requests the Commission continue to list the agreement that is the subject of

this docket on the Mail Classification Schedule through December 31, 2015, to give

effect to the pending extension likely to be executed by the Postal Service and Royal

Mail. The Postal Service plans to file the modification and any successor agreement

with the Commission as soon as possible.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno

Chief Counsel

Global Business and Service Development

Corporate and Postal Business Law Section

Kyle Coppin Attorney

475 L'Enfant Plaza, S.W. Washington, D.C. 20260-1137

(202) 268-2368; Fax -5628

October 30, 2015